

Consistent with the FCC rules, NTUA Wireless will make available Lifeline rate plan(s) to qualified low-income consumers on the Navajo Nation for a rate as low as \$1 per month.

G. NTUA WIRELESS SUBMITS A FIVE-YEAR BUILD OUT PLAN FOR ITS ETC SERVICE AREA.

Attached as Confidential Exhibit C is NTUA Wireless' 5-year build out plan as required by Section 54.202(a)(1)(ii) of the FCC rules. The build out plan includes the construction of numerous cell sites aimed at bringing the benefits of wireless service to consumers throughout Navajo Nation.³¹

H. NTUA WIRELESS WILL BE ABLE TO FUNCTION IN EMERGENCY SITUATIONS.

NTUA Wireless is a facilities-based wireless telecommunications carrier with its own switching, transport, cell sites, and associated telecommunications facilities in the proposed designated ETC service area. NTUA Wireless will be able to function in emergency situations as set forth in Section 54.201(a)(2), which includes "a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."³² In particular, NTUA Wireless will have the following capabilities to remain functional in emergency situations:

- Availability of fixed and portable back-up power generators at various network locations throughout NTUA Wireless' network that can be deployed in emergency situations.

³¹ Upon receipt of binding assurances from the NNTRC that it will hold the confidential materials confidential to the same extent as does the FCC, these exhibits will also be provided to NNTRC.

³² 47 C.F.R. § 54.202(a)(2).

- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels (“COWs”), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-solutions, such as additional capacity and antenna towers, can be deployed.
- Sites not equipped with fixed generators typically have battery back-up systems installed to maintain service in the event of a widespread power outage.

I. NTUA WIRELESS IS COMMITTED TO CONSUMER PROTECTION AND SERVICE QUALITY STANDARDS.

Pursuant to 47 C.F.R. § 54.202(a)(3), an ETC applicant is required to demonstrate that it will satisfy applicable consumer protection and service quality standards. In this regard, NTUA Wireless commits that it will comply with the CTIA Consumer Code for Wireless Service.

J. NTUA WIRELESS OFFERS LOCAL USAGE PLANS COMPARABLE TO THOSE OFFERED BY THE INCUMBENT CARRIER.

NTUA Wireless will offer local usage plans comparable to those offered by the ILECs on the Navajo Nation, including rate plans that provide unlimited local calling on the Navajo Nation and surrounding areas.³³ For many consumers, NTUA Wireless’ rate plans will be more attractive than the existing ILEC rate plans because of larger local calling areas, mobility, convenience, and added features. In particular, NTUA Wireless’ customers will be subjected to fewer toll charges than customers of the ILECs, and customers will have a choice of local usage plans. For these reasons, NTUA Wireless’ service plans will be reasonably comparable to the ILEC rate plans.

³³ 47 C.F.R. § 54.202(a)(4).

K. NTUA WIRELESS ACKNOWLEDGES THAT IT MAY BE REQUIRED TO PROVIDE EQUAL ACCESS.

NTUA Wireless acknowledges that, pursuant to Section 54.202(a)(5) of the FCC's rules,³⁴ it could be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

IV. NTUA WIRELESS' REQUESTED ETC SERVICE AREA IS THE EXTERIOR BOUNDARIES OF THE NAVAJO NATION.

NTUA Wireless requests a designated service area that includes the area within the exterior boundaries of the Navajo Nation, including Eastern Navajo Agency and the "island" chapters of To'hajilee, Alamo and Ramah. Attached as Exhibit D is a map showing the boundaries and the Navajo Nation and the matching ETC service area.

NTUA Wireless' ETC service area includes the following telephone company areas, as depicted in Exhibit D and listed in Exhibit E:

- (i) Navajo Communications Company, Inc. – Arizona, including all wire centers within its Arizona study area;
- (ii) Navajo Communications Company, Inc. – New Mexico, including all wire centers within its New Mexico study area;
- (iii) Navajo Communications Company, Inc. – Utah, including all wire centers within its Utah study area;
- (iv) Sacred Wind, including all wire centers within its New Mexico study area;
- (v) One Quest (non-rural telephone company) wire center in New Mexico;
- (vi) Two partial Quest (non-rural telephone company) wire centers in Arizona;

³⁴ 47 C.F.R. § 54.202(a)(5).

- (vii) One partial Beehive Telephone Company wire center in Utah;
- (viii) One partial Arizona Telephone Company wire center in Arizona;
- (ix) One partial Citizens Telephone Company of the White Mountains, Inc. wire center in Arizona;
- (x) One partial Table Top Telephone Company wire center in Arizona;
- (xi) One partial CenturyTel of Southwest, Inc. wire center in New Mexico; and
- (xii) One partial Western New Mexico Telephone wire center in New Mexico.

By seeking designation in the areas identified above and reflected in Exhibits D and E, including the partial wire centers of Beehive Telephone Company, Arizona Telephone Company, and Citizens Telephone Company of the White Mountains, Inc., NTUA Wireless will be able to serve all of Navajo Nation and provide essential Lifeline service to qualified low-income consumers.

Redefinition. NTUA Wireless requests that the Commission redefine the service areas of Beehive Telephone Company (SAC 502284), Arizona Telephone Company (SAC 452171), and Citizens – Frontier White Mountain (SAC 454426) to those areas within the Navajo Nation and those areas outside of the Navajo Nation. By redefining these rural telephone company areas, NTUA Wireless will be able to serve the entire Navajo Nation, which would serve the public interest by: (i) allowing NTUA Wireless to serve the communications needs of all tribal members and residents of the Navajo Nation; (ii) enabling the availability of NTUA Wireless' Lifeline service offering throughout the Navajo Nation; and (iii) eliminating artificial barriers based upon incumbent local exchange carrier service area boundaries so that a tribally-owned enterprise is able to serve all tribal areas. The Commission has the requisite authority to redefine the service areas of the rural telephone companies to those areas within the Navajo Nation and those areas outside of the Navajo Nation without seeking the concurrence of the state

commissions.³⁵ Because obtaining ETC status is critically important, NTUA Wireless requests immediate designation in those telephone company areas that do not require further review and consideration.

Redefinition is also in the public interest and consistent with the factors to be considered under 47 C.F.R. § 54.207 in that: (1) there would be no cream-skimming; (2) it would not have any adverse impact on the rural telephone companies; and (3) there would be no administrative burdens associated with redefinition.³⁶

No Cream-Skimming. NTUA Wireless' service area is based upon the boundaries of the Navajo Nation. There is no picking and choosing of areas to be served. In fact, the Navajo Nation represents some of the most rural and impoverished areas within the study areas of the Beehive Telephone Company, Arizona Telephone Company, and Citizens – Frontier White Mountain.

No Significant Impact On The Rural Telephone Companies. By redefining the study areas of Beehive Telephone Company, Arizona Telephone Company, and Citizens – Frontier White Mountain to those areas within the Navajo Nation and those areas outside of the Navajo Nation, it will not affect the rural status of these telephone companies. Furthermore, redefinition will not affect the amount of universal service funding received by the rural telephone companies.

³⁵ See *In the Matter of Federal-State Joint Board on Universal Service; Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota*, Memorandum and Order, 16 FCC Rcd 18133, 18140 (2001) (“*Pine Ridge ETC Order*”).

³⁶ 47 C.F.R. § 54.207; see also *Federal-State Joint Board on Universal Service*, Recommended Decision, 12 FCC Rcd 87, 180 (1996) (*Joint Board Recommended Decision*).

No Administrative Burdens. Redefinition also will not impose administrative burdens on any entity, including the rural telephone companies. While the rural telephone companies may seek to have their cost disaggregated to reflect the redefinition of their study areas, they are not required to do so and redefinition, by itself, would not compel the telephone companies to disaggregate their support. In fact, disaggregation would likely result in increased support levels on the Navajo Nation.

V. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST.

Grant of this Petition will significantly benefit the Navajo Nation and its people by enabling NTUA Wireless, a majority-owned Navajo enterprise, to serve the communications needs of the Navajo Nation by utilizing the expertise and resources of the Navajo Tribal Utility Authority. ETC designation will provide critical funding for the build out and operation of essential telecommunications services in the Navajo Nation provide low-income consumers with access to discounted telephone service.

A. BENEFITS OF NTUA WIRELESS SERVING THE COMMUNICATIONS NEEDS OF THE NAVAJO PEOPLE.

NTUA Wireless knows and understands the unique setting of the Navajo Nation and will provide much-needed wireless telecommunications services tailored to the needs of the Navajo Nation. The vast scale of NTUA's service territory, along with its remote and isolated nature, has inhibited the penetration of communications and utility services to much of the Navajo Nation in the past. NTUA Wireless will uniquely be able to address this challenge in part by leveraging a large-scale telecommunications infrastructure project, which NTUA is currently constructing.

ETC designation is critically important for NTUA Wireless. It will provide the necessary vehicle to fund infrastructure development and on-going operational costs, while enabling

Lifeline service to tribal residents. It will also greatly benefit life on the Navajo Nation by enabling NTUA Wireless to serve the communications needs of residents and provide much needed local technical and sales jobs. NTUA Wireless will exclusively focus on the needs of residents of the Navajo Nation, including the need for local 911 emergency service, service to unserved and underserved areas, and affordable voice and data services. Furthermore, NTUA Wireless promotes majority ownership by Navajo enterprises and creates a model to improve the quality of life for the Navajo people through economic development.

B. BENEFITS OF INCREASED COMPETITION.

The benefits of competition are widely recognized and extend to all markets, including the universal service market, as recognized by the FCC:

We note that an important goal of the Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies. We agree with Western Wireless that competition will result not only in the deployment of new facilities and technologies, but will also provide an incentive to the incumbent rural telephone companies to improve their existing network to remain competitive, resulting in improved service to Wyoming consumers [consumers in the proposed ETC service area]. In addition, we find that the provision of competitive service will facilitate universal service to the benefit of consumers in Wyoming by creating incentives to ensure that quality services are available at “just, reasonable, and affordable rates.”

In the Matter of the Federal-State Joint Board on Universal Service, Western Wireless Corp. Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, CC Docket No. 96-45, *Memorandum Opinion and Order*, DA. 00-2896, ¶ 17 (released December 26, 2000).

Consumers rely on wireless services for their telecommunications needs. NTUA Wireless’ designation as an ETC will result in consumers having greater access to wireless telecommunications services in rural areas, thereby advancing the basic goal of preserving and

advancing universal service. *See*, 47 U.S.C. § 254(b). In rural areas, the universal service goal is clear:

Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

47 U.S.C. § 254(b)(3).

To accomplish this goal, a competitive universal service framework has been established with consumers benefiting from competing carriers vying for their business based upon price, service offerings, coverage, and service quality. NTUA Wireless is uniquely positioned to serve the wireless needs of consumers in the Navajo Nation. Furthermore, NTUA Wireless' status as majority-owned by the Navajo Tribal Utility Authority positions the company to utilize the best practices of the utility in serving the needs of consumers in the Navajo Nation.

C. THE NAVAJO NATION GOVERNMENT SUPPORTS NTUA WIRELESS' ETC PETITION.

As mentioned above, attached as Exhibit A is a letter dated March 1, 2011 from Navajo Nation Office of the President and Vice President, supporting NTUA Wireless' Petition for ETC designation on the Navajo Nation. That letter states: "On behalf of the Navajo Nation, I respectfully submit this letter to express my support of the Petition for Designation as an Eligible Telecommunications Carrier ("ETC") for the Navajo reservation ("Petition") to be filed by the Navajo Tribal Utility Authority ("NTUA") and Comnet Wireless, LLC ("Commnet")." The benefits to the Tribe and Tribal members and residents of the Navajo Nation were clearly expressed by President Shirley:

"Wireless telecommunications service is a vital means of communications on the reservation and increasingly relied upon by tribal members, residents, and visitors. The

Joint Venture, which is owned 51% by NTUA, is building a state-of-the-art advanced wireless telecommunications infrastructure that will serve as a platform for business, social, educational, and economic development, providing basic telephone and advanced broadband services, jobs for tribal members, and a communications network for the health, safety, and well-being of the Navajo citizens.

NTUA Wireless understands and agrees that the NNTRC will participate in this proceeding.³⁷

D. NTUA WIRELESS IS A FULL SERVICE TELECOMMUNICATIONS CARRIER PROVIDING COMMERCIAL MOBILE RADIO SERVICES ON THE NAVAJO NATION.

NTUA Wireless is a full service telecommunications carrier providing CMRS on the Navajo Nation. As a full service telecommunications carrier, NTUA Wireless will serve the existing and evolving telecommunications needs of residents of, and visitors to, the Navajo Nation with a specific focus on the needs of tribal members. As a tribally-owned carrier providing service only on the Navajo Nation, NTUA Wireless is uniquely positioned to address the needs of consumers in the Navajo Nation and has developed rate plans and service offerings tailored to these needs, along with terms and conditions of service that enable the Navajo people to take full advantage of the service offerings.

³⁷ NNTRC has authority over wireless carriers such as NTUA Wireless to the same extent as would a state public utilities commission. Thus, although, under 47 U.S.C. § 332(c)(3), state governments (and thus also, NNTRC) cannot regulate market entry of wireless carriers, state PUCs (and thus also, NNTRC) can regulate other aspects of telecommunications operations. Among other things, NNTRC has informally requested, and NTUA Wireless has agreed, to refrain from engaging in “traffic pumping” or similar types of traffic stimulation in order to obtain access fee revenues from long-distance carriers. Indeed, since wireless carriers typically do not charge excessive “access fees” for termination of traffic originating elsewhere, the public interest is benefited by having a wireless carrier such as NTUA Wireless perform as the tribal ETC.

VI. CERTIFICATION FOR USE OF UNIVERSAL SERVICE FUNDS.

NTUA Wireless certifies that it will use federal high-cost universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, in accordance with 47 USC § 254(e). NTUA Wireless' high-cost certifications pursuant to 47 C.F.R. §§ 54.313(a), 54.314(a), 54.809, and 54.904 are attached hereto as Exhibit F. To ensure that NTUA Wireless' receipt of federal universal service support is effective as of its designation date, it is requested that the Commission provide a supplemental certification for NTUA Wireless' use of universal service support. The FCC rules expressly provide for the filing of supplemental certifications for new ETC designations.

VII. ANTI-DRUG ABUSE ACT CERTIFICATION.

NTUA Wireless attaches, as Exhibit G, its certification that no party to this Petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.


CONCLUSION

NTUA Wireless has demonstrated that it possesses sufficient technical, financial and managerial resources and abilities to provide universal service and Lifeline service on the Navajo Nation and that consumers will significantly benefit from its designation as an ETC. NTUA Wireless respectfully requests the Commission designate it as an eligible telecommunications carrier for purposes of receiving federal universal service support on the Navajo Nation. Because obtaining ETC status is critically important, NTUA Wireless requests immediate

designation in those telephone company areas that do not require further review and consideration.

Respectfully submitted,

NTUA WIRELESS, LLC

By: _____

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Seth Lucia
Duncan, Weinberg, Genzer, & Pembroke, P.C.
1615 M Street, N.W.;
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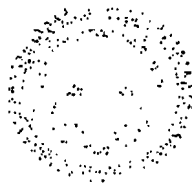
Commnet Wireless, LLC's Attorney

March 3, 2011

EXHIBIT A:

**LETTER OF SUPPORT FROM
NAVAJO NATION PRESIDENT BEN SHELLY**

THE NAVAJO NATION



BEN SHELLY PRESIDENT
REX LEE JIM VICE PRESIDENT

March 1, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Navajo Nation Support for Petition for Eligible
Telecommunications Carrier ("ETC") Designation**

Dear Chairman Genachowski,

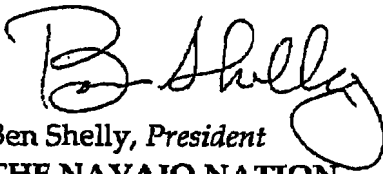
On behalf of the Navajo Nation, I respectfully submit this letter to express my support of the Petition for Designation as an Eligible Telecommunications Carrier ("ETC") for the Navajo reservation ("Petition") to be filed by the Navajo Tribal Utility Authority ("NTUA") and Commnet Wireless, LLC ("Commnet"). NTUA and Commnet have formed a joint venture ("Joint Venture") that leverages NTUA's utility infrastructure and business model within the Navajo Nation with the wireless telecommunications expertise of Commnet to the benefit of the Nation and the surrounding communities. The Navajo Nation recognizes that an ETC designation is critically important for the Joint Venture to: (i) obtain the funding for the capital expenditures to build-out service throughout the reservation; (ii) obtain the benefits necessary to offset the high cost related to operating in the rural area that comprises the Navajo Nation; and (iii) provide Lifeline and emergency services for Navajo residents.

Wireless telecommunications service is a vital means of communication on the reservation and increasingly relied upon by tribal members, residents, and

visitors. The Joint Venture, which is owned 51% by NTUA, is building a state-of-the-art advanced wireless telecommunications infrastructure that will serve as a platform for business, social, educational, and economic development, providing basic telephone and advanced broadband services, jobs for tribal members, and a communications network for the health, safety, and well-being of the Navajo citizens.

I know that the Navajo Nation Telecommunications Regulatory Commission (NNTRC), which pursuant to Navajo Nation statute has jurisdiction over telecommunications services and service providers on the Nation will be reviewing this petition and commenting during this proceeding. I leave it to their expertise to make the ultimate determination of whether the particular service offerings as proposed in the petition are in the best interest of the Navajo people. As presented to me, it appears that granting ETC status to the Joint Venture is necessary to ensure that the Nation receives the benefits of the telecommunication infrastructure described herein. Therefore, I support the NTUA and Commnet Petition for Designation as an Eligible Telecommunications Carrier for the Navajo Nation.

Very Respectfully,



Ben Shelly, President

THE NAVAJO NATION

cc: Commissioner Meredith Baker
Commissioner Michael Copps
Commissioner Mignon Clyburn
Commissioner Robert McDowell

EXHIBIT B:

**COPY OF NTUA WIRELESS'
BUSINESS REGISTRATION
FILED WITH THE NAVAJO NATION**

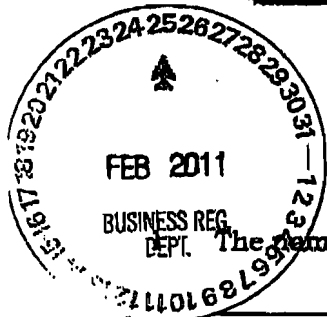
Navajo Nation
Division of Economic Development
Post Office Box 663
Window Rock, AZ 86515



Business Regulatory Dept
(928) 871-7365
871-6714
Fax: (928) 871-7381

NAVAJO NATION LIMITED LIABILITY COMPANY ACT

APPLICATION FOR REGISTRATION OF A FOREIGN LIMITED LIABILITY COMPANY



The name of the foreign limited liability company is: NTUA Wireless, LLC

- 1.a. If the exact name of the foreign limited liability company is not available for use in the Navajo Nation, then the fictitious name adopted for use by the limited liability company in the Navajo Nation is:

2. The company is organized under the laws of the State of Delaware.
3. The date of the company's formation is: 12-15-2010.
4. The purpose of the company or the general character of business it proposes to transact in the Navajo Nation is:
Provided Telecommunications Services

5. The name and street address of the statutory agent for the foreign limited liability company within the Navajo Nation is:
NAVAJO TRIBAL UTILITY AUTHORITY
Attn: Mary Richards
P.O. Box 170

Fort Defiance, AZ 86504

ACCEPTANCE OF APPOINTMENT BY STATUTORY AGENT

I, Mary Richards, having been designated to act as statutory agent,
(Print Name)
hereby consent to act in that capacity until removed or resignation is submitted in accordance with the Navajo Nation Limited Liability Company Act.

Signature: Mary Richards

NAVAJO TRIBAL UTILITY AUTHORITY

If signing on behalf of a company, please print company name here.

6. Management Structure (select option A or B):

- A. ☐ Management of the limited liability company is vested in a manager or managers. The names and addresses of each person who is a manager AND each member who owns a twenty percent or greater interest in the capital or profits of the limited liability company are:

Name: _____

☐ member ☐ manager

Address: _____

City, State, Zip: _____

Name: _____

☐ member ☐ manager

Address: _____

City, State, Zip: _____

Name: _____

☐ member ☐ manager

Address: _____

City, State, Zip: _____

Name: _____

☐ member ☐ manager

Address: _____

City, State, Zip: _____

- B. ☒ Management of the limited liability company is reserved to the members. The names and addresses of each person who is a member are:

Name: Navajo Tribal Utility Authority Name: Commnet Wireless, LLCAddress: P.O. Box 1520Address: 400 Northridge Road, Suite 325City, State, Zip: Fort Defiance, AZCity, State, Zip: Atlanta, GA 3035086504

Name: _____

Name: _____

Address: _____

Address: _____

City, State, Zip: _____

City, State, Zip: _____

7. The address of the office required to be maintained in the jurisdiction under the laws of which the company is organized, if required; or, if not required, the address of the principal office of the company is:

P.O. Box 1520Fort Defiance, AZ 86501-1520

Executed this 25th day of February, 2011

Mary Richards

Signature

Mary Richards

Print Name (Check One) ☐ Member ☐ Manager ☒ Authorized Agent

Phone: 928-729-6202 Fax: 928-729-2135

EXHIBIT C:

**(PUBLIC VERSION – DOES NOT CONTAIN
CONFIDENTIAL INFORMATION)**

EXHIBIT D:

**(PUBLIC VERSION – DOES NOT CONTAIN
CONFIDENTIAL INFORMATION)**

EXHIBIT E:

**LIST OF TELEPHONE COMPANIES IN
ETC SERVICE AREA**

EXHIBIT E:
NTUA Wireless, LLC
Navajo Nation ETC Service Area

February 2011

Telephone Company	Full Study Area/Complete Wire Center/Partial Wire Center	Wire Center
Arizona Telephone Company	Partial Wire Center	MRCNAZXC
Beehive Telephone Company	Partial Wire Center	DNRPUTXC
CenturyTel of Southwest, Inc	Partial Wire Center	PNHLNMXC
Citizens Telecom Co. of Wht Mtns, Inc.	Partial Wire Center	STJHAZXB
Navajo Communications Company	Full Study Area	BLMSAZXF
Navajo Communications Company	Full Study Area	CHNLAZXC
Navajo Communications Company	Full Study Area	DLKNAZXC
Navajo Communications Company	Full Study Area	DNHSAZXC
Navajo Communications Company	Full Study Area	FTDFAZXC
Navajo Communications Company	Full Study Area	GANDAZXC
Navajo Communications Company	Full Study Area	GSWDAZXC
Navajo Communications Company	Full Study Area	KABTAZXC
Navajo Communications Company	Full Study Area	KIVGAZXC
Navajo Communications Company	Full Study Area	KYNTAZXC
Navajo Communications Company	Full Study Area	LCHEAZXC
Navajo Communications Company	Full Study Area	LEPPAZXC
Navajo Communications Company	Full Study Area	LKCHAZXC
Navajo Communications Company	Full Study Area	MNFRAZXC
Navajo Communications Company	Full Study Area	PINNAZXC
Navajo Communications Company	Full Study Area	RDVYAZXC
Navajo Communications Company	Full Study Area	RHRKAZXC
Navajo Communications Company	Full Study Area	RKPNAZXC
Navajo Communications Company	Full Study Area	SHNTAZXC
Navajo Communications Company	Full Study Area	STMCAXXE
Navajo Communications Company	Full Study Area	TBCYAZXC
Navajo Communications Company	Full Study Area	TNPSAZXR
Navajo Communications Company	Full Study Area	TOYIAZXC
Navajo Communications Company	Full Study Area	TSILAZXC
Navajo Communications Company	Full Study Area	WDRNAZXC
Navajo Communications Company	Full Study Area	CRPNNMXC
Navajo Communications Company	Full Study Area	NAVJNMXC
Navajo Communications Company	Full Study Area	NSCHNMXC
Navajo Communications Company	Full Study Area	NWCMNMXC
Navajo Communications Company	Full Study Area	PBPONMXC
Navajo Communications Company	Full Study Area	SANSNMXC
Navajo Communications Company	Full Study Area	SHRKNMXC
Navajo Communications Company	Full Study Area	TBNTNMXC
Navajo Communications Company	Full Study Area	TDLNNMXC
Navajo Communications Company	Full Study Area	THTCNMXC
Navajo Communications Company	Full Study Area	TRNSNMXC
Navajo Communications Company	Full Study Area	TWLKNMXC
Navajo Communications Company	Full Study Area	HLCHUTXC
Navajo Communications Company	Full Study Area	MNCKUTXC
Navajo Communications Company	Full Study Area	MNVYUTXC
QWEST CORPORATION	Partial Wire Center	FLGSAZMA

EXHIBIT E:
NTUA Wireless, LLC
Navajo Nation ETC Service Area

February 2011

QWEST CORPORATION	Complete Wire Center	GLLPNMFW
QWEST CORPORATION	Partial Wire Center	PAGEAZMA
SACRED WIND	Full Study Area	FRTNNMMA
SACRED WIND	Full Study Area	FRTNNMWE
SACRED WIND	Full Study Area	GLLPNMEA
SACRED WIND	Full Study Area	GLLPNMMA
Table Top Telephone Company	Partial Wire Center	SNDRAZXC
Western New Mexico Telephone	Partial Wire Center	MGDNNMXC

EXHIBIT F:
HIGH-COST UNIVERSAL SERVICE CERTIFICATIONS

Non-Rural High-Cost Support

February 7, 2011

2011 - 2012

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

HIGH-COST SUPPORT

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

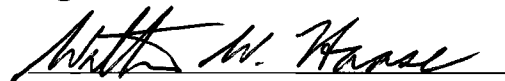
Re: CC Docket No. 96-45
Non-Rural Use High-Cost Support
Annual Certification Filing Pursuant to 47 C.F.R. § 54.313

This is to certify that NTUA Wireless, LLC will use its **NON-RURAL HIGH-COST SUPPORT** only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act, 47 U.S.C. § 254(e).

I am authorized to make this certification on behalf of the company name above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
NTUA Wireless, LLC	Navajo Nation – Arizona	
NTUA Wireless, LLC	Navajo Nation – New Mexico	
NTUA Wireless, LLC	Navajo Nation – Utah	

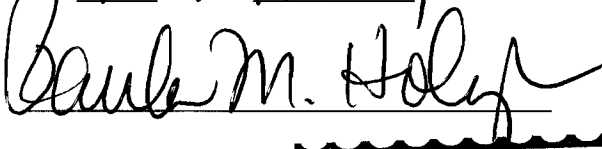
Signed,



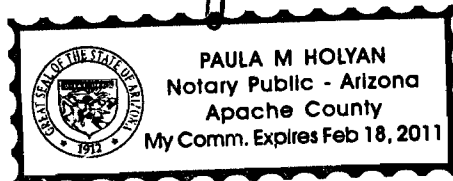
Carrier's Name: NTUA Wireless, LLC

Subscribed and sworn to before me

this 7th day of February 2011.



Notary Public



Date Received
(For official use only)

Rural High-Cost Support

February 7, 2011

2011 - 2012

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

HIGH-COST SUPPORT

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

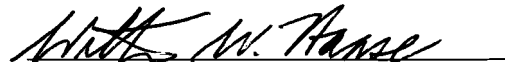
Re: CC Docket No. 96-45
Rural Use High-Cost Support
Annual Certification Filing Pursuant to 47 C.F.R. § 54.314

This is to certify that NTUA Wireless, LLC will use its **RURAL HIGH-COST SUPPORT** only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Communications Act, 47 U.S.C. § 254(e).

I am authorized to make this certification on behalf of the company name above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
NTUA Wireless, LLC	Navajo Nation – Arizona	
NTUA Wireless, LLC	Navajo Nation – New Mexico	
NTUA Wireless, LLC	Navajo Nation – Utah	

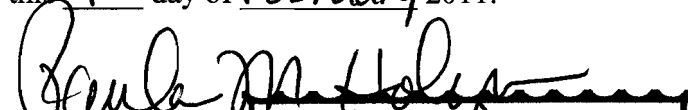
Signed,

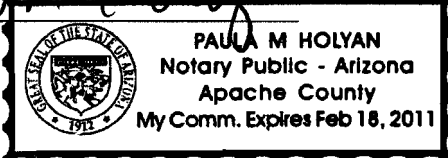


Carrier's Name: NTUA Wireless, LLC

Subscribed and sworn to before me

this 7th day of February 2011.


Notary Public



Date Received
(For official use only)

Interstate Access Support (IAS)

February 7, 2011

2011 - 2012

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

IAS

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

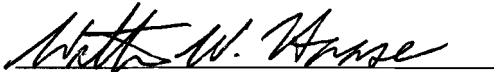
Re: CC Docket No. 96-45
Interstate Access Support -- IAS
Annual Certification Filing

This is to certify that NTUA Wireless, LLC will use its **INTERSTATE ACCESS SUPPORT – IAS** only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company name above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
NTUA Wireless, LLC	Navajo Nation – Arizona	
NTUA Wireless, LLC	Navajo Nation – New Mexico	
NTUA Wireless, LLC	Navajo Nation – Utah	

Signed,



Carrier's Name: NTUA Wireless, LLC

Date Received
(For official use only)

Interstate Common Line Support (ICLS)

February 7, 2011

2011 - 2012

To: Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

ICLS

Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

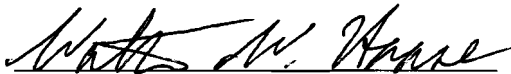
Re: CC Docket No. 96-45
Interstate Common Line Support -- ICLS
Annual Certification Filing

This is to certify that NTUA Wireless, LLC will use its **INTERSTATE COMMON LINE SUPPORT – ICLS** only for the provision, maintenance and upgrading of facilities and services for which the support is intended.

I am authorized to make this certification on behalf of the company name above. This certification is for the study area(s) listed below.

Company Name	State	Study Area Code
NTUA Wireless, LLC	Navajo Nation – Arizona	
NTUA Wireless, LLC	Navajo Nation – New Mexico	
NTUA Wireless, LLC	Navajo Nation – Utah	

Signed,




Carrier's Name: NTUA Wireless, LLC

Date Received
(For official use only)

EXHIBIT G:

SECTION 5301 ANTI-DRUG ABUSE CERTIFICATION

NTUA Wireless, LLC hereby certifies that neither the applicant nor any party to the application is subject to a denial of Federal Benefits, that include FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862 because of conviction for possession or distribution of a controlled substance. *See* 47 C.F.R. § 1.2002(b) for the definition of "party for these purposes.



Name: Walter W. Haase

Title: Member

Company: NTUA Wireless, LLC

Address: P.O. Box 170
Fort Defiance, AZ 86504

Dated: February 7, 2011